



April 10, 2004

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report April 1 – April 30, 2004**

Dear Mr. Fayoumi,

Enclosed is the Sauget Sites Area I Monthly Report for the April 2004 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven D. Smith".

Steven D. Smith

cc: Kevin Turner – USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski - Monsanto

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Status Report

Date of Report: May 10, 2004
Period Covered: April 1, 2004 - April 30, 2004

Work Performed during the Reporting Period

Borrow Pit Lake

Sediment sampling in the Borrow Pit Lake commenced on May 6, 2003 and was completed on May 14, 2003. All sampling activities were observed on a full time basis by a USEPA oversight contractor. No deficiencies or problems were identified by the oversight personnel during the sampling. Samples were shipped to the analytical laboratories identified in the QAPP for analysis. Laboratory results were validated. The draft report was submitted to the Agency on September 2, 2003.

The BPL ecological assessment was conducted on October 20-22, 2003. EPA oversight was in attendance.

Dead Creek

Received U.S. EPA's comments for:

- Dead Creek, Review of Responses to Comments and Proposed Action Plan*
- Human Health Risk Assessment, Sauget Area One Site, Illinois.*

DNAPL Work Plan

Comments were received on the DNAPL Investigation Work Plan that was submitted to the Agencies on February 28, 2003. Responses to these comments were submitted to the Agencies on May 13, 2003. The Agency responded on July 24, 2003, requiring Solutia to submit responses and an approvable DNAPL Work Plan that will address all focus areas and information requested in the January 9, 2003, U.S. EPA Additional Work Letter. The response to comments and the Work Plan were submitted to the Agency on August 14, 2003. Comments were received from the Agencies on October 15, 2003, and a response was sent on November 3, 2003.

Conditional approval of the DNAPL Workplan was received on December 23, 2003, which requires completion of the investigation and submittal of the DNAPL Report by June 23, 2004.

The final DNAPL Work Plan was submitted to the Agencies on April 20, 2004. The schedule for completion of the study was discussed at a meeting with the Agencies on April 20, 2004. At that meeting, it was agreed that field work for the investigation would begin during the week of May 7, 2004. It was also pointed out that the schedule contained in the approved Work Plan envisaged the investigation taking 6 months to complete. Thus, the June 23, 2004 completion date contained in the conditional approval letter could not be realized and an extension would almost certainly be necessary. The USEPA wants to see the investigation under way before considering any schedule extension.

The existing access agreements to properties involved with the DNAPL investigation have to be revised. Property owners were contacted during the reporting period and revised agreements were finalized with most of the owners by the end of April.

Attachments

There are no Technical Memoranda or data submittals with this report.

Work Scheduled for Next Reporting Period

- Finalize the revisions to all access agreements necessary to carry out the DNAPL investigations.
- Begin the DNAPL investigations during the week of May 7, 2004.

Submittal Schedule Status

No other submittals are currently scheduled.